

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

**DONNA K. SOUTTER and
TONY LEE WEBB,
For themselves and on behalf of all
similarly situated individuals.**

Plaintiff,

v.

CIVIL ACTION NO. 3:10CV00107

EQUIFAX INFORMATION SERVICES, LLC.

Defendant.

DECLARATION OF PLAINTIFF TONY LEE WEBB

COME NOW the Plaintiff Tony Lee Webb, and for his declaration, he states as his own personal knowledge:

1. I am one of the two named Plaintiffs in the above-styled matter. I am competent to testify as stated herein and do so on my own personal knowledge. I am familiar with the facts of my own case against Equifax.
2. I filed this lawsuit as a result of inaccurate information in my Equifax credit reports. Approximately a year and a half ago, I discovered that Equifax was reporting in my credit reports an outstanding judgment that had reportedly not been appealed, satisfied or vacated.

3. That judgment was originally reported by Equifax as having been obtained by a company named Darmar, LLC in the General District Court for the City of Roanoke.

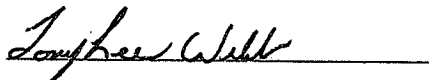
4. This judgment did not belong to me and apparently was meant for a different Tony Webb.

5. I disputed this inaccurate reporting in July 2009 by writing to Equifax at its Atlanta address. On August 14, 2009, Equifax mailed me the results of its investigation. And stated to me that it had verified with the Court that the information was correct and that it would remain on my credit reports.

6. I want my case to stay in Richmond. The distance is not unreasonable for me. I have stated my willingness to actively participate in my case in Richmond for depositions, settlement discussions or meetings and for trial. I am at least somewhat familiar with Richmond. Besides myself, I am not aware of any Virginia witnesses residing in Roanoke that would be necessary for me to prove the facts in my lawsuit. I have not determined if I will have any witnesses in the Roanoke area that would testify as to how Equifax's inaccurate reporting harmed me. However, I am very confident that any friends or family members who may be necessary for this case – if any – would assist me by traveling voluntarily to Richmond for trial.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: May 21, 2010

A handwritten signature in cursive script, appearing to read "Tony Lee Webb", is written over a horizontal line.

TONY LEE WEBB